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FILED IN THE U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

MAY 12 2021

SEAN F. MCAVOY, CLERK  
DEPUTY  
YAKIMA, WASHINGTON

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RYAN SHOEMAKER  
(a/k/a "Mike McCoy"),

Defendant.

1:21-CR-2014-SAB

INDICTMENT

Vio: 21 U.S.C. § 841(a)(1),  
(b)(1)(A)(viii)  
Distribution of 50 Grams  
or More of Actual (Pure)  
Methamphetamine

21 U.S.C. § 853  
Forfeiture Allegation

The Grand Jury charges:

On or about December 11, 2020, in the Eastern District of Washington, the  
Defendant, MICHAEL RYAN SHOEMAKER (a/k/a "Mike McCoy"), did  
knowingly and intentionally distribute fifty (50) grams or more of actual (pure)  
methamphetamine, a Schedule II controlled substance, in violation of  
21 U.S.C. § 841(a)(1), (b)(1)(A)(viii).

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby re-alleged and Incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. § 841(a)(1), as set forth in this Indictment, the Defendant, MICHAEL RYAN SHOEMAKER (a/k/a "Mike McCoy"), shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense, including, but not limited to the following listed property:

- \$1,350.00 U.S. currency, obtained by MICHAEL RYAN SHOEMAKER (a/k/a "Mike McCoy") on December 11, 2020, from a Drug Enforcement Administration confidential source in exchange for methamphetamine.

If any forfeitable property, as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

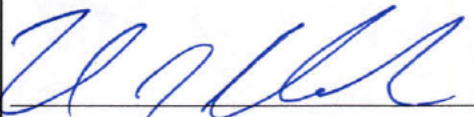
1 the United States of America shall be entitled to forfeiture of substitute property  
2 pursuant to 21 U.S.C. § 853(p).  
3

4 DATED this 12<sup>th</sup> day of May 2021.

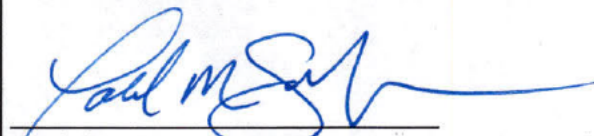
5  
6 A TRUE BILL

7  
8  
9 foreperson

10  
11 Joseph H. Harrington  
12 Acting United States Attorney

13 

14 Thomas J. Hanlon  
15 Supervisory Assistant United States Attorney

16  
17 

18 Todd M. Swensen  
19 Assistant United States Attorney